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ORGANIC PROGRAM

2005 JUN 16 A 10: 06

June 10, 2005

National Organic Standards Board
c/o Arthur Neal
Room 4008 – South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal:

Dairy Farmers of America, Inc. (DFA) is a milk marketing cooperative owned and operated by over 22,000 members with farms located in 47 states. The DFA Board of directors at its June 9, 2005 meeting took action in support of the comments contained in this letter. DFA requests the NOSB's indulgence with the timing of these comments in that the elected dairy farmer board that representing the membership did not have a scheduled meeting that would have met the initial request date for comments.

We are writing in response to the NOSB "Guidance for Interpretation of section 205.239(a)(2) of the National Organic Program, published for public comment on March 22.

We are against certain portions of the language of Sections (A) and (C). The language in section (B) is acceptable.

We are concerned about how the restrictions of sections A and C could slow down the growth of organic dairy nationwide, or even lead to a loss of organic dairies. A restrictive section that hurts organic dairies would have a negative impact on the ability for DFA members and other dairies to convert to organic and to participate in the growth of organic. Furthermore, it appears that these sections were not designed with the specific goal of facilitating the growth organic dairy production in every U.S. region and geography. DFA believes that the requirements of dairy production, including organic dairy, should be designed to facilitate the growth of organic dairies in every U.S. region, geography and climate.

In Section (A), we disagree with two parts of the wording. First, we disagree with the specific numerical requirement for 30% dry matter intake on a daily basis during the growing season but not less than 120 days. In the experience of our members, numerical restrictions like these will be impossible for producers to manage and impossible for certifiers to audit. In addition, there are many different climates, soils and

farm management plans. Individual farms and organic certifiers should be given the interpretive freedom to develop a good organic farm plan that upholds organic standards and works well in the specific location of the farm.

Second, we disagree with the five reporting requirements of this section. Organic farm plans already require extensive reporting verification of how the farm is to be managed. We do not believe that additional reporting is useful or beneficial either to dairy producers or to the organic program. These five requirements are not workable, nor are they even measurable. What's more, they impose additional record-keeping burdens on a farm plan that is already filled with time-consuming reporting requirements.

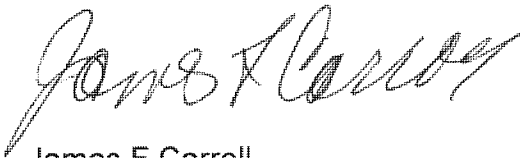
In Section (C), we disagree with using the National Resources Conservation Service Practice Standards for Prescribed Grazing (code 528) for regulating dairy animal grazing. While NRCS code 528 can provide useful and valuable information for livestock producers, it is not appropriate as a required regulatory document for dairy farm management.

The language of Section (B) is acceptable to us.

Thank you for your time.

Sincerely,

DAIRY FARMERS OF AMERICA, INC.

A handwritten signature in cursive script, appearing to read "James F. Carroll".

James F Carroll
VP Quality Assurance & Regulatory Affairs